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February 12, 1993

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FEB 12 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: Deas Communications, Inc., et al.
MM Docket No. 92-111, Healdsburg, CA


Dear Ms. Searcy:

Submitted herewith for filing, on behalf of our client, Healdsburg Empire Corporation, are an original and six copies of its Reply in the above-referenced proceeding.

Please direct all communications regarding this matter to:

Jerome S. Boros, Esquire
Rosenman & Colin
575 Madison Avenue
New York, NY 10022
(212) 940-3800

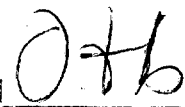
Very truly yours,


Shelley Sadowsky
Member, Maryland Bar Only

Enclosures

cc: Attached Service List

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Applications of)	MM Docket 92-111
)	
DEAS COMMUNICATIONS, INC.)	File No. BPH-910208MB
)	
HEALDSBURG EMPIRE CORPORATION)	
)	
For Construction Permit for a)	
New FM Station on Channel 240A)	
in Healdsburg, California)	

TO: Hon. Walter Miller
Administrative Law Judge

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY

HEALDSBURG EMPIRE CORPORATION ("Empire Healdsburg"), by its attorneys, replies to the Findings of Deas Communications, Inc. ("Deas") in this proceeding.

1. Deas is disentitled to integration credit because Mr. Deas does not propose to become integrated at any determinate or determinable point of time, but rather only prior to Program Tests, i.e., after construction has been completed. But, Mr. Deas' non-integration into the construction process necessarily will delay the initiation and completion of construction and yield an integration proposal which ultimately is illusory. Stripped of obfuscatory language, Deas proposes that integration will commence when he gets around to it.

2. In addition, the Deas proposal is deficient because Mr. Deas does not propose to sever all ties with the machinery company he chiefs - he has not testified that he will quit as a director, a companion-piece to being a company president in corporate America.

3. In contrast, Joann Kilmartin will quit her present position to work at Empire Healdsburg's station. Deas' findings acknowledge as much.

4. Deas claims that it should prevail because of diversification, noting that Empire Healdsburg is chargeable with stations which are recited to be within 100 miles of Healdsburg. A fuller recitation would focus on the 100-mile separation and the fact that about 25 San Francisco stations intervene, and that none of the stations chargeable to Empire Healdsburg impact on the economic life of the service area or provide a listenable signal thereto. To be sure, the Commission has awarded demerits for distant media holdings, but here any demerit should be trivial, assuming that any diversification demerit is appropriate - which Empire Healdsburg disputes. This is particularly so since a grant to Empire Healdsburg would provide Healdsburg with a fresh media voice independent of such socio-economic power as Mr. Deas yields in Healdsburg life.

5. On balance, Empire Healdsburg thus is the preferred applicant in this case.

Respectfully submitted,

HEALDSBURG EMPIRE CORPORATION

By: Jerome S. Boros /kySS
Jerome S. Boros

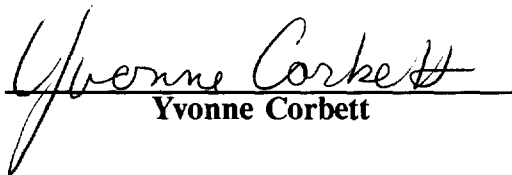
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Its Attorneys

Dated: February 12, 1993

CERTIFICATE OF SERVICE

I, Yvonne Corbett, a secretary with Rosenman & Colin, certify that on this 12th day of February, 1993, I have sent by first-class mail or caused to be hand delivered a copy of the foregoing "**Reply**" to all persons on the attached LIST I.


Yvonne Corbett

LIST I

Hon. Walter C. Miller*
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* By Hand